REMARKS

Applicant thanks the Office for its detailed analysis and respectfully requests reconsideration and allowance of all of the claims of the application. Claims 1, 4-13, 35, 41-45, 47 and 52-54 are presently pending. Claims amended herein are 1, 8, 11, 35, 41-45, 47 and 52-54. Claims cancelled herein are 2-3, 23-24, 39-40, 46, 48-51, and 55-56. New claims added herein are none.

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Substantive Claim Rejections

Claim Rejections under § 103

The Office rejects all of the pending claims under §103. In light of the foregoing amendments, Applicant respectfully requests that the rejections be withdrawn and the case be passed along to issuance.

The Office rejected all claims in the current Application, stating that the claims were unpatentable under USC § 103(a) over the combination of the following references:

- **Pstruh.cz:** *Pstruh.cz*, dated October 13, 1999; and
- **Smith:** *Smith*, US Patent No. 6,018,748 (issued 1/25/00)

Applicant has amended the claims for the sole purpose of streamlining prosecution and respectfully submits that newly amended claims overcome the Office's current rejections. Applicant therefore respectfully requests that the rejections be withdrawn for two reasons: (1) because neither reference, either alone or in combination, teaches the previously recited or added elements, and (2) because the requisite motivation to combine the references does not exist.

CITED REFERENCES

Pstruh.cz

Pstruh.cz describes a URL Replacer Software that can be downloaded from the website www.pstruh.cz. According to **Pstruh.cz**, "[t]he ISAPI filter replaces defined parts of URL from browser. It enables url to scripts (.asp, .cgi, .dc) with parameters look like static html pages or specify exact download

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filename generated by script." (*Pstruh.cz*, p. 1). According to the reference, the user is able to configure the replacer, so as to program exactly what portions of the web address should be deleted and exactly what the deleted portion should be replaced with. For example, **Pstruh.cz** gives the following sample configuration and the resulting replacement:

Current replacements

	Find what	**Replace with**
Delete	/?	/default.asp?
Delete	.asp/	.asp?
Delete	xhtml	.asp?

This configuration enables replace
http://www.server.com/any.asp/name1=value1/name2=value2/name3=value3/file.htm
...
to
http://www.server.com/any.asp?name1=value1&name2=value2&name3=value3&file.htm

Id. Therefore, when the user attempts to access the URL: http://www.server.com/any.asp/name1=value1/name2=value2/name3=value3/file.htm, the user instead is directed to the following URL: http://www.server.com/any.asp?name1=value1&name2=value2&name3=value3&file.htm. Furthermore, in the parent case's Action, the Office aptly states that "**Pstruh.cz** does not teach generating an instance of a main Web page having at least one link with a dynamic address pointing to a dynamic Web page."

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Smith

Smith describes a method and apparatus for creating and displaying dynamic link labels in a browser program operating on a remote user station. The link labels are created in an application program which can be run within the browser, and the link labels are designed to operate in a similar manner as HTML hyper links. *The link labels can also dynamically change in response to user input into the browser.* (*Smith*, abstract) (emphasis added). **Smith** is more easily understood with reference to Figs. 3A-3C, depicted below:

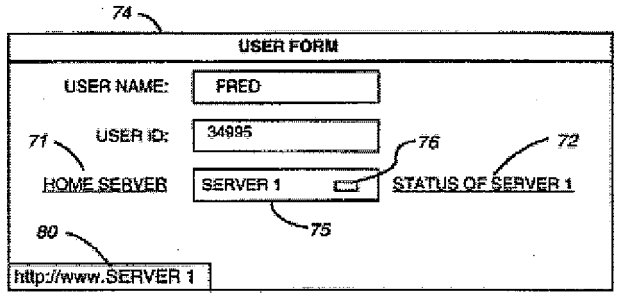


Fig. 3A

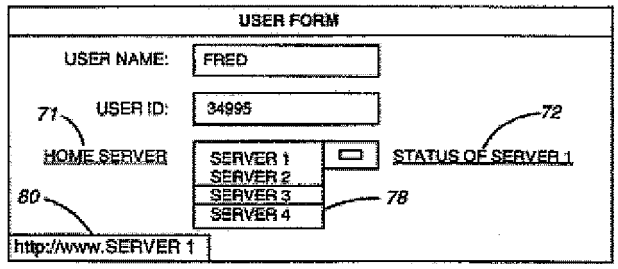


Fig. 3B

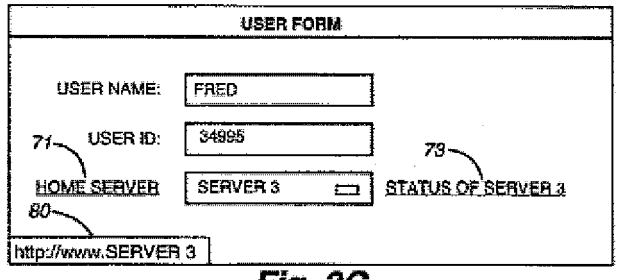


Fig. 3C

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Figs. 3A-3C illustrate examples of browser pages 74 of the **Smith** disclosure. The page 74 has a link label 71 of "HOME SERVER" with an associated data field 75 within a pull-down menu 76. Link label 72 "STATUS OF SERVER 1" is also displayed on page 74. The browser displays URL status in block 80, which indicates the URL associated with a link label presently selected by the user. Link labels 71 and 72 of Fig. 3A have *dynamic characteristics* and can be made to respond to user input into the browser window. (*Smith*, col. 5, lines 24-39) (emphasis added).

In Fig. 3A, link label 71 indicates the HOME SERVER of the user Fred and link label 71 has a URL address associated with SERVER 1, shown in block 80. However, the user may access the pull-down menu 76 and choose SERVER 3, as shown in Fig. 3C. At this point, *the URL corresponding to HOME SERVER link label 71 would be updated to reflect the address of SERVER 3, as shown in block 80.* (*Smith*, col. 5, lines 41-52) (emphasis added). In sum, **Smith** describes creating link labels within a web browser, wherein the URL addresses are able to change due to user input.

Obviousness Rejections

Claim 1

As amended, claim 1 recites a method comprising (added language emphasized):

- *receiving a request from a search engine to crawl a Website*;
- generating an instance of a main Web page having at least one link with a dynamic address pointing to a dynamic Web page;

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- converting the dynamic address into a static address that also points to the dynamic Web page;

- *sending the instance of the main Web page to the search engine;*

- *facilitating crawling, by the search engine, the static address located on the main Web page, so that the search engine may send the static address to a user of the search engine; and*

- *re-directing the user to the dynamic Web page after selection of the static address.*

In making out a rejection of claim 1, the Office first cites **Pstruh.cz** as teaching "converting the dynamic address into a static address that also points to the dynamic Web page." The Office concedes that **Pstruh.cz** does not teach teaching "generating an instance of a main instance of a main Web page having at least one link with a dynamic address pointing to a dynamic Web page," although the Office then cites **Smith** as teaching this element. Finally, the Office states that it would have been obvious to combine these teachings to produce an "efficient system". (*Office Action of 5/01/06*, p. 3).

Applicant respectfully requests that the rejection be withdrawn for the following reasons: (1) Neither reference teaches the elements of the amended claim; and (2) the Office fails to provide the requisite motivation to combine the references.

Applicant respectfully submits that neither of the cited references, either alone or in combination, teach amended claim 1. As described above, **Pstruh.cz** merely teaches a URL replacer, while **Smith** describes displaying dynamic link labels in a browser program. In contrast, Applicant's claims may *allow a search engine to effectively search a Web site with dynamic Web pages*. Neither cited reference teaches the specific elements of—nor relates to the problems solved

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by—Applicant's claims. Some advantages disclosed in the current Application are described below, and serve to highlight the dissimilarities between the cited reference and the Applicant's disclosure:

> A Web address converter converts dynamic Web pages in a manner that overcomes the drawbacks of the "snapshot" approach. The Web address converter *helps dynamic Web sites get the attention of the spiders of Internet search engines*. With the Web address converter, requests from Web browsers using static addresses access corresponding dynamic Web pages and requests from search engines generate an instance of a Web page having links with static addresses pointing to corresponding dynamic Web pages.
>
> The Web address converter performs both Dynamic-to-Static (D-to-S) address conversion and Static-to-Dynamic (S-to-D) address conversion. *D-to-S address conversion is done when generating a spider-friendly main page for a spider of a search engine to crawl. S-to-D address conversion is used when a browser uses a static address to access a corresponding dynamic Web page.* The static address that the browser uses was originally created when the spider-friendly main page was generated.

(Specification, page 7, line 19 through page 8, line 7) (emphasis added).

Applicant therefore respectfully requests that the rejection of newly-amended claim 1 be withdrawn and the claim be forwarded onto issuance.

Furthermore, Applicant submits that the Office fails to show a motivation to combine **Pstruh.cz** and **Smith**. In the Action, the Office essentially offers the following three statements when concluding that one of ordinary skill in the art (hereinafter, "OOSA") would be motivated to combine the references:

- "[B]ecause it would [result in] an ***efficient system***...."

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- "[Because it would] provide a specific function on a Web page that a user can ***click on*** in order to ***access or connect to another document***...."

- "Also, ***improving the system's performance*** by reducing network access times and avoiding network latency."

The above motivations given by the Office for combining references appears to just a mere broad assertion that a combination would be "better" or "more efficient." As such, Applicant submits that such an assertion is insufficient motivation. Instead, the Office has the burden of showing objective motivation to combine, either from the references themselves or from the knowledge possessed by OOSA. *See* MPEP 2143.

Applicant asks the Office to identify—with particularity—where the cited references show the motivation to combine their teachings to produce a combination of the all of the claimed elements and with such elements arranged in the claimed manner.

Furthermore, Applicant is confused by the Office's indications the an OOSA would be motivated to combine the references in order to "provide a specific function on a Web page that a user can ***click on*** in order to ***access or connect to another document.***" Where does one reference suggest or teach something that would motivate an OOSA to look to the other reference to provide "function on a Web page that a user can ***click on*** in order to ***access or connect to another document?***"

Accordingly, Applicant therefore respectfully submits that the Office has not provided objective evidence showing how a OOSA would be

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motivated to combine the references to produce the claimed elements in the claimed arrangement.

For at least this additional reason, Applicant therefore respectfully requests that the rejection of newly-amended claim 1 be withdrawn and the claim be forwarded onto issuance.

Claims 2-7

These claims ultimately depend upon independent claim 1. As discussed above, claim 1 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each of these dependent claims as they all depend on an allowable claim.

Claims 8-13, 35, 41-45, 47, and 52-54

For the sole purpose of streamlining prosecution, all independent claims in the Application have been amended to recite elements similar to those discussed above in regards to claim 1. Therefore, for at least the reasons discussed above, Applicant respectfully requests that the rejections of claims 8-13, 35, 41-45, 47, and 52-54 be withdrawn. Furthermore, Applicant submits that each of these claims is also allowable for its own respective merits.

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Conclusion

All pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Office is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

Dated: 6-30-06

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